

EXHIBIT 3

to

DEFENDANT BUILD OUR CENTER'S MOTION FOR LIMITED PROTECTIVE ORDER TO STAY DISCOVERY AS TO BUILD OUR CENTER

In

Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

Email from Michael Large

EXHIBIT 3

From: Large, Michael <mlarge@da.washoecounty.gov>
Sent: Tuesday, January 7, 2025 9:34 AM
To: Alison Kertis <akertis@sierracrestlaw.com>; Const2Audit <const2audit@gmail.com>
Cc: Maureen McCue <mmccue@sierracrestlaw.com>; Mayra Ibarra <mibarra@sierracrestlaw.com>
Subject: RE: Ribar v. Washoe County, Build Our Center, et. al

Ms. Kertis,

I believe that a stay of discovery as to Build Our Center is appropriate and will not oppose the Motion to Stay.



Michael W. Large
Deputy District Attorney (Civil)
District Attorney's Office
mlarge@da.washoecounty.gov | Office: 775.337.5712
One South Sierra Street, Reno, NV 89501



CONFIDENTIAL: This e-mail, including any attachments, is intended only for the person or entity to which it is addressed. This e-mail may contain confidential information, proprietary information, and/or information which is protected by the attorney-client privilege or work product doctrine. The unauthorized review, use, forwarding, printing, copying, disclosure, or distribution of this e-mail is strictly prohibited. If you are not the intended recipient or have reason to believe you are not authorized to receive this e-mail, please promptly delete this message and notify the sender.

From: Alison Kertis <akertis@sierracrestlaw.com>
Sent: Tuesday, January 7, 2025 9:12 AM
To: Const2Audit <const2audit@gmail.com>; Large, Michael <mlarge@da.washoecounty.gov>
Cc: Maureen McCue <mmccue@sierracrestlaw.com>; Mayra Ibarra <mibarra@sierracrestlaw.com>
Subject: Ribar v. Washoe County, Build Our Center, et. al

Dear Mr. Ribar and Mr. Large, A few updates. I spoke with Build Our Center about participating in an early neutral evaluation. Build Our Center is open to participation, pending an approximation of the cost. Additionally, I would like to stay

Dear Mr. Ribar and Mr. Large,

A few updates. I spoke with Build Our Center about participating in an early neutral evaluation. Build Our Center is open to participation, pending an approximation of the cost.

Additionally, I would like to stay discovery as to Build Our Center pending full briefing and the Court's adjudication of our Motion to Dismiss. Please let me know if you consent to a limited stay as to Build Our Center; if not, I will file the appropriate motion. We would like to keep litigation costs down as much as possible. Please let me know whether you agree by no later than January 9, 2024.

Regards,

Alison



Alison R. Kertis, Esq.

Senior Attorney

(775) 448-6070

akertis@sierracrestlaw.com

SierraCrestLaw.com

6770 South McCarran Blvd.,

First Floor

Reno, Nevada 89509

We guide small business owners over rocky legal terrain so they can protect and grow their companies.

This transmittal is privileged and confidential. If it is addressed to a client, agent, or employee of this firm, it is also protected by the attorney client privilege and the attorney work product doctrine. If the reader of this transmittal is not the intended recipient, you are hereby notified that any dissemination, distribution, use, or copying of this message is strictly prohibited. If you received it in error, please delete the message and notify us immediately via email or telephone (at the address or number listed above). Further, in accordance with Treasury Regulation Circular 230, you are hereby informed that this firm does not provide any tax advice.